

To: Burns, Francis[Burns.Fran@epa.gov]
From: Matlock, Dennis
Sent: Fri 1/17/2014 6:22:18 PM
Subject: Fw: hotspot update
[WV Chemical Leak site photos Jan 16 2014.pdf](#)

Fran fyi

From: [Ex. 6 - Personal Privacy]@TechLawInc.com>
Sent: Friday, January 17, 2014 1:19:32 PM
To: Matlock, Dennis
Cc: Ventura, Dominic
Subject: RE: hotspot update

Temperatures dropped below 30 degrees overnight and there was a minor amount of snowfall. Surface water along the slope behind the tanks was frozen and very little water is observed emerging from storm drain area. River flow has significantly decreased, and is almost back to normal.

The results from CST's sample collection of the water from the pooled areas along the roadside have been received. The samples were non-detect for MCHM. WVDEP is looking into allowing the water to be discharged directly into the sewer system or treated.

A minor permit modification was granted by WVDEP to Freedom Industries allowing disposal of solid waste at the City of Charleston's Landfill. The MCHM solid waste was deemed non-hazardous according to RCRA. Approval was granted for disposal of 2,000 tons per year.

A total of 19 baker tanks are full of the MCHM-contaminated water, and are stored at the Poca facility. EnviroClean is collecting samples from the tanks. Any Baker tanks that are single-walled are being replaced with those that are double-walled. Additional security measures are being taken in this staging area, including installation of wireless cameras. These cameras are also going to be installed in the tank storage area at Freedom Industries, in order to conduct 24-hour monitoring of the tanks to ensure that no additional leaks are occurring.

Freedom Industries is awaiting WVDEP permit for the approval of treatment of the MCHM-contaminated water, via air stripping and carbon treatment.

Installation of fencing was completed along the crest of the river bank. The fencing extends from the southwestern end of the facility in a northeastern direction, along the river, to the base of the initial spill area. The fencing consists of outer orange hi-vis fence, with interior silt fence (on the facility side). The fencing was installed in areas of the Site where surface soils were disturbed.

Removal of trees and vegetation was completed at the northeastern end of the facility, along the slope that is beneath the two 400,000-gallon glycerin tanks. These tanks still contain approximately 48,000 gallons of glycerin, which is too thick to pump out. Plans remain to add water to the glycerin in order to increase the viscosity of the fluids to facilitate pumping into transport trucks. Glycerin from the other four storage tanks located at the southwestern end of the facility is currently being pumped into tanker trucks and transported off Site, per WVDEP order.

The poly liner in the interceptor trench was peeled back to facilitate extension of the trench; the trench was extended in a northeastern direction, towards the rear of the 400,000-gallon glycerin tanks. The trench then continued in an easterly direction, up the slope, towards the base of the containment wall. The trench was diverted around an existing gas line. The contractors covered the trench with poly liner and extended it into the existing interceptor trench area. At this time, all poly liner is connected to divert all of the runoff water from the containment areas and storm drain into a single interceptor trench.

The monitoring wells were developed on Site by the subcontractor, EnviroProbe. There are four monitoring wells in the base of the slope, located adjacent to the riverbank; these are 20 feet bgs. There are three monitoring wells located in front of the containment area, adjacent to the road; these are 40 feet bgs.

Clean Harbors continued to maintain the boom deployed in the river. The boom was reported to have no MCHM odor and no product was observed on the absorbent booms.

Containments were constructed beneath the roll-off boxes on Site. These roll-offs will be used to stage the MCHM-contaminated soils that will be removed from the slope behind the tanks.

The Do Not Use order was lifted for over 90% of the zones.